

EXHIBIT 21

Memorandum of Activity

Case Number: I16A0120900	Office: JRI-5 Western (San Francisco)	Type of Activity: Interview
Date of Activity: 02/22/2017	Date Report Drafted: 03/21/2017	Location of Activity: 5401 Southpoint Centre Blvd Fredericksburg VA 22407
Subject of Activity: CROUCH, JIM	Activity Conducted By (Name(s)): Brian DuBois	Signature: B D

On February 22, 2017, Jim Crouch, Director of Safety and Training, U.S. Parachute Association, Fredericksburg, VA, was interviewed by Special Agents Bret Stolle and Brian DuBois, U.S. Department of Transportation, Office of Inspector General. The interview was conducted with S/A DuBois on the telephone and S/A Stolle and Crouch at the USPA office. The purpose of the interview was to discuss the USPA certification process, what records USPA maintains and what information Crouch had regarding the August 2016 deaths of two skydivers associated with Parachute Center, Lodi, CA. After being advised of the agents' identities and the nature of the interview, Crouch provided the following information:

If an individual was interested in getting skydiving certification, they would sign up for instruction at a "drop zone", referring to a skydiving center and business. The student, also referred to as a candidate, would attend four to six hours of ground school and then participate in their first parachute jump. Students will conduct additional jumps, from higher altitudes, doing their own deployments and learning canopy flying. After training and 25 jumps, students will get an "A" license, allowing them to parachute without a coach or instructor. There are two types of "A" License paperwork. Drop zones with their own training programs will use the 2-page shorter license paperwork. This license only lists the advancement criteria. Those who use the USPA curriculum have a longer license sheet. In the past, either the Examiner or the Candidate would submit the completed certificates.

There are approximately 270 drop zones throughout the United States. Of those, approximately 220 are USPA Group Members, meaning they pledge to follow USPA regulations and adhere to standards set by the USPA. The remaining drop zones are not USPA members and do not necessarily meet the standards set by the USPA. Parachute Center, Lodi, CA, is not a USPA Group Member, though a lot of their jumpers are USPA members. Some of the center's instructors are USPA certified instructors.

There are USPA "instructors" and "coaches". The Coach Rating Course is a USPA certification for "coaches." "Instructors" have more training than "Coaches". Coaches work with jumpers who are looking to improve their technique. Instructors make the final decisions regarding students attaining "A" licenses. The Instructors will oversee the Coaches. Coaches have at least an "A" License and more than 100 jumps.

There are different types and levels of instructors, to include Static Line, Accelerated Free Fall, Instructor Assisted Deployment, and Tandem. A Tandem Instructor will have a "D" License, the highest parachuting license, and over 500 jumps.

There are also Examiners and Evaluators for instructors. Examiners train trainers, as well as supervise and teach courses. Evaluators are experienced drop zone staff members who assist Examiners with training. Evaluators are like "apprentices" to examiners.

There are two separate numbers certified parachutists are assigned: a USPA membership number and a USPA license number. The parachutist will be assigned one USPA membership number, while they will receive a new license number for each license they earn. In the past, examiners or the candidates could submit the proficiency

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cards for licenses once they are completed; examiners would usually give the candidate the card to submit. However, the proficiency cards were not being properly submitted to the USPA. Recently, USPA changed their policies, now requiring the examiner to submit the card to the USPA. Once the USPA receives a proficiency card for a parachutist, the parachutist will receive a license number. The number is specific to that license, and a new number is issued for each additional license a parachutist earns. A parachutist will have multiple license numbers but only one USPA number.

Candidates applying for an A-license "receives" the license once it is signed by the examiner, meaning they can do anything an A-license allows. It is good for 60-days after which, the parachutist must have the physical license. For the other licenses, they are only valid after the USPA receives the proficiency card. In Yonghyeon Kwon's case, he "technically" should have waited until the USPA received his Tandem Instructor proficiency card and issued him a license before conducting tandem instruction. Since the early 2000s, there was a practice of allowing a 30-day provision for B, C, D, and instructor ratings. The practice was stopped approximately two-weeks ago. If Kwon completed his training on July 21, 2016, he was within that 30-day period. Proficiency Cards not being submitted occurs occasionally, but not in the numbers as seen in Robert Pooley and Yuri Garmashov taught courses. Their courses have higher rates of failures to submit proficiency cards.

In addition to completing the USPA Tandem Instructor Course, USPA requires instructors to earn a rig manufacturer rating. This means the parachutist received specific training on the tandem parachute rig they intend to use.

Most examiners will submit scanned copies of a candidate's proficiency card to USPA, and will keep the original or return the original to the candidate. USPA advises candidates to keep their records for two years; Crouch was not sure if that was in writing as policy.

If a USPA endorsed parachute center, or Group Member, is not following the USPA guidelines, USPA can take action against the parachute center. Even if the parachute center is not USPA certified, the USPA can take action against individuals USPA members associated with the parachute centers. Some believe USPA rules don't apply to non-Group Members, however, the rules still apply to the individual USPA members. The USPA will give Group Members wall certificates to show they are USPA supported. Some Group Members will have pictures of their parachutists up with their respective ratings for customers to see. A large part of the parachuting community uses "contractors" instead of "employees" to conduct their tandem parachute jumps.

There is no requirement that instructors are to show their USPA certifications. If asked for them, they should have them. Crouch advises the public to look for rated instructors.

Crouch stated Pooley was a problem from Day 1 as an examiner in 2012. In 2013, Crouch "got on" him for his clerical errors. Completed certificates were not being submitted for candidates. In December 2013, USPA Headquarters told the Regional Director about the issues with Pooley. The Regional Director spoke with Pooley about it. In February 2014, during a compliant group meeting, it was decided to require Pooley to complete retraining; this was completed on February 7, 2014. In 2015, USPA received allegations that Pooley was abusing prescription drugs; Pooley received an FAA medical exam in April 2015 and was cleared to continue parachuting. In June 2015, there were more problems with Pooley's paperwork management. In July 2015, the USPA suspended Pooley's Examiner rating for one year due to the paperwork issues. He was permitted to keep his Instructor ratings, but could only jump and support courses as an evaluator. Pooley never re-earned his Examiner rating; in July 2016 he requested his Examiner rating, but the board chose not to re-instate him. He had not regained the confidence of the board, and his appeal appeared to blame others for his problems rather than accepting responsibility. Since July 2015, Pooley has only been permitted to serve as an evaluator and instructor.

A review of Pooley and Garmashov's certificates indicated they had an "awful lot" of international candidates they were training, from Europe, Australia, and New Zealand. Some schools do specialize in providing USPA ratings

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and this draws a lot of international business. International candidates will train in the U.S. then return to their home country. A vast majority of Examiners will train local people and they do not provide instruction full-time.

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There had not been any complaints about Garmashov's instruction prior to the fatality. After the fatality, Joshua Hall, a Regional Director with USPA, learned neither Garmashov nor Pooley would teach all the emergency procedures in some courses prior to candidates conducting their first jump tandem jump. Emergency procedures are part of the core of USPA instruction. Another complaint indicated Garmashov was not providing the instruction or supervising Pooley. He would instead be parachuting while Pooley taught the class, which was against USPA policy since he was the course Examiner. Additionally, the Examiner was responsible for handling the paperwork, to include the proficiency cards. However, during a conversation with Crouch, Garmashov "slipped up" and admitted he always had to search for Pooley to get the paperwork for the candidates, despite the fact he should have been the one managing it.

Garmashov always claimed to be administratively diligent as an Examiner. However, after the fatality, he gave a list to USPA of approximately 10 names of candidates he trained but not provided the USPA paperwork for.

After reviewing the Proficiency Cards signed by Pooley and Garmashov, it became apparent Garmashov's signature was suspect. According to Hall's investigation provided to Crouch, the Proficiency Cards appeared pre-stamped with Garmashov signature. His investigation also revealed Pooley was running the course, though he was not approved to do so by the USPA. As a result of Hall's investigation, Garmashov's licenses were also pulled.

William Dause's licenses were pulled following the fatality because he knew of Garmashov and Pooley's arrangement to provide training and he allowed it to occur. He allowed Pooley to teach classes without Garmashov's supervising. Crouch never met Dause, but found it strange Dause never seemed too concerned about fatalities at Parachute Center. Parachute Center was a very busy parachuting establishment. According to other parachutists, Dause would be the first one to throw you out of his center for breaking the rules. Crouch further clarified though it was for breaking "Bill's Rules." Crouch clarified with very busy drop zones, accidents happen. There are a couple other non-Group Member drop zones throughout the country.

Tom Noonan is the United Parachute Technologies' (UPT) Tandem Program Director. UPT was the company that manufactured the tandem rig involved in the fatality.

Two weeks prior to the fatality, the USPA was given a video of a 10-year old participating in a tandem parachute jump at Dause's parachute center. As a result, USPA started investigating the instructors at Parachute Center, realizing many of the instructors at the center were not USPA certified. Hall conducted the investigation for USPA.

USPA had no membership documentation, licenses, or records for Kwon. The "pending", written on Kwon's license application for Kwon's membership number for his D License and Tandem Instructor Proficiency Card, would have been a red-flag, because he would have needed a membership number for his A License.

The interview concluded and Crouch was advised to contact DOT-OIG if he thought of any additional information.

Reviewed By (Initials): L G Date: 03/22/2017

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